

## **REMARKS**

Claims 1, 4, 30, 39, 51, 53 and 71 are amended. Claims 5 and 6 are canceled. Claims 72-77 are added. Claims 1-4 and 7-77 are in the application for consideration.

Claims 51 and 71 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten into independent form, including all of the limitations of the base claim and any intervening claims. Claims 51 and 71 have been so rewritten, and accordingly should be formally allowed. Action to that end is requested.

Independent claims 1, 30 and 53 stand rejected as being obvious over a combination of U.S. Patent No. 5,955,244 to Duval in view of U.S. Patent No. 6,013,582 to Ionov et al. Independent claims 1, 30 and 53 have been amended to recite that the outer surface comprises at least one of a silicon oxide-containing material, an organic-containing material, a silicon nitride-containing material, or a silicon carbide-containing material. Support for the same can be found in Applicant's specification as-filed collectively in paragraphs **[0005]**, **[0022]**, **[0028]** and **[0029]** such that no new matter is added.

The Examiner relies upon certain language appearing in columns 1 and 2 of the Ionov et al. patent, apparently specifically that amino basic groups react with acid thereby de-activating the same and resulting in foot formation. However, the Ionov et al. patent only discloses/teaches that such occurs "on some ARC material such as titanium nitride". (col.2, Ins.6,7). Nowhere else in Ionov et al. are these alleged other "materials" identified, with titanium nitride

being the only identified material. Further, the undersigned finds no specific reference to "titanium nitride" in the cited Duval patent.

Yet, Duval teaches that application of a base over its disclosed materials results in a vertical profile or a re-entrant profile (neither of which by definition creates a foot) in its patterned photoresist, as Applicant asserted in the last-filed response. In Duval, such materials include silicon oxides and silicon nitrides (col.11, Ins.34-37), organic materials (col.7, Ins.20-33), and silicon carbides (col.4, Ins. 30-34). Further, at col.7, Ins.9-19, Duval clearly teaches generally that it is acidic surfaces which cause footing, and it is a basic agent which neutralizes acid to preclude footing. Accordingly, the Ionov et al. patent stands only for the proposition that treatment with certain basic groups of an outer surface comprising titanium nitride results in increased footing. Ionov et al. in no way teaches or suggests that treatment with a base of any of the materials now appearing in Applicant's independent claims results in increased footing, and in fact Duval teaches the exact opposite. Accordingly, with respect to outer surfaces comprising at least one of silicon oxide-containing material, an organic-containing material, a silicon nitride-containing material, or a silicon carbide-containing material, the application of Ionov et al. with Duval would not lead one of skill in the art to believe that a foot would form, and Duval teaches the exact opposite of Ionov et al. and Applicant's independent claims in this regard. Accordingly for at least this reason, Applicant's amended independent claims 1, 30 and 53 should be allowed, and action to that end is requested.

Applicant's dependent claims should be allowed as depending from allowable base claims, and for their own recited features which are neither shown nor suggested in the cited art. Action to that end is requested.

This application is believed to be in immediate condition for allowance.

Respectfully submitted,

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By: 

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